

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in compliance with D.N.J. LBR 9004-1(b)**

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Chapter 13

**In re:**

Case No.: 22-18303 RG

**ALEXANDRE DACOSTA and  
VIVIANNE ANTUNES**

Hearing Date: December 7, 2022

**Debtor(s).**

**NOTICE OF MOTION FOR ORDER CONVERTING CASE TO  
TO CHAPTER 11 AND DIRECTING JOINT ADMINISTRATION WITH  
CHAPTER 11 CASE OF BAV AUTO, LLC**

The Debtors Alexandre Dacosta and Vivianne Antunes ("Movants"), respectfully move for an order converting the above-captioned case from Chapter 13 to Chapter 11 and directing that it be administered jointly with the Chapter 11 case of BAV Auto, LLC. **Your rights may be affected.** You should read these papers carefully and discuss them with your lawyer, if you have one on this case. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the court to enter the requested order, or if you want the court to consider your views on the motion, then at least seven (7) days in advance of the hearing, you or your lawyer must:

File with the court a written response or answer explaining your position, and mail a copy too:

Norgaard, O'Boyle & Hannon  
184 Grand Avenue  
Englewood, New Jersey 07631

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it at least seven (7) days in advance of the hearing date.

**HEARING SCHEDULED TO BE HELD BEFORE:**

Honorable: Rosemary Gambardella, U.S.B.J.

Date: December 7, 2022

Time: 10:00 A.M.

Place: King Federal Building, 50 Walnut Street, Newark, NJ 07102

APPEARANCES MAY BE MADE TELEPHONICALLY  
THROUGH COURT SOUTIONS

Pursuant to D.N.J. LBR 9013-1(f), the movant waives oral argument unless opposition to the motion is filed or the court requires appearances. Pursuant to D.N.J. LBR 9013-1(d), if you wish to oppose the motion, you must file with the Office of the Clerk of the Bankruptcy Court responding papers stating with particularity the basis of your opposition to the motion.

Copies of the two proposed orders that the movant seeks are enclosed with this Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter the order requested therein.

**Statement of Non-Necessity of Brief:** The movants certify pursuant to D.N.J. LBR 9013-2 that this motion involves common questions of law and fact and does not involve complex or novel issues requiring the submission of a legal brief.

NORGAARD, O'BOYLE & HANNON  
*Attorneys for Movants*

Dated: November 15, 2022

/s/ John O'Boyle  
John O'Boyle, Esq.